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October 21, 2024

**VIA ECF**

Honorable Julien X. Neals, U.S.D.J.  
Honorable Leda D. Wettre, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *United States v. Apple Inc.*, No. 2:24-cv-04055-JXN-LDW (D.N.J.)**

Dear Judge Neals and Judge Wettre:

I write on behalf of Defendant Apple Inc. (“Apple”) in response to non-party Match Group, Inc.’s (“Match”) October 8, 2024, motion to intervene for the limited purpose of seeking certain protective order provisions relating to Match materials that may be produced in this action. Match’s Mot. to Intervene (ECF No. 156); *see* Match’s Mem. in Supp. of Mot. to Intervene (ECF No. 156-1) at 1 (requesting leave “to intervene in this case for the limited purpose of obtaining protective order provisions”); *id.* at 5, 9, 12 (similar). Along with its motion to intervene, Match also filed a “Position Statement on Protective Order,” including certain exhibits thereto, setting forth Match’s position on the protective order provisions it seeks. ECF No. 156-2. Match’s counsel also appeared at the October 10, 2024, conference before Judge Wettre in which protective order provisions were discussed.

Apple does not oppose Match’s intervention for the limited purpose of seeking protective order provisions. *See* Match’s Mem. in Supp. of Mot. to Intervene (ECF No. 156-1) at 1. As discussed with Judge Wettre at the October 10, 2024, conference, Apple believes that the parties, and interested non-parties, will be able to agree to appropriate provisions governing access to sensitive materials. The parties and non-parties are engaged in discussions along those lines, and they will update the Court as those discussions progress. Apple’s non-opposition to Match’s limited intervention is without prejudice to and is not intended to waive any arguments regarding the substance of Match’s positions relating to the protective order.

Apple thanks the Court for its time and attention to this matter.

Respectfully submitted,

*s/ Liza M. Walsh*

Liza M. Walsh

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cc: All Counsel of Record (via ECF)